Transmittal

Sent Via: ☐ **Messenger** ☐ **U.S. Mail** ☒ **Overnight Mail**

Date: December 15, 2015

To: Lee Hammond
Environmental Site Remediation
1400 Douglas Street, STOP 1030
Omaha, Nebraska 68179

From: Daniel Costamagna
Amec Foster Wheeler
Irvine, California

cc:

Project Number: 0106270030

Project Name: Former Pechiney Cast Plate, Inc. Facility, Vernon, California

Item	Description
1	UPRR Application for Right of Entry Agreement
2	Check for Application
3	Work Plan for Proposed Sampling

Remarks

Enclosed please find the above mentioned subject documents. Please call us at (949) 642-0245 if you have any other questions or concerns.

Sincerely yours,
Amec Foster Wheeler

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Amec Foster Wheeler Environment & Infrastructure, Inc.
121 Innovation Drive, Suite 200
Irvine, CA
USA 92617-3094
Tel (949) 642-0245
Fax (949) 642-4474
www.amecfw.com

APPLICATION FORM FOR UNION PACIFIC RAILROAD COMPANY
ENVIRONMENTAL RIGHT OF ENTRY AGREEMENT

Please fill in as indicated. Please type or print clearly in all capital letters:

RESPONSIBLE PARTY / LICENSEE:

Company Name FORMER PECHINEY CAST PLATE, INC.

P O Box & Street Address 4700 DAYBREAK PARKWAY

City, State, Zip Code SOUTH JORDAN, UTAH 84095

State of Incorporation _____

Contact: (Name / Title) GERRY PEPPER

(Phone / Fax) _____

(email, if possible) gerald.pepper@gmail.com

LICENSEE CONSULTANT (if applicable):

Company Name AMEC FOSTER WHEELER

P O Box & Street Address 121 INNOVATION DRIVE, STE 200

City, State, Zip Code IRVINE, CALIFORNIA 92617

Contact: (Name / Title) LINDA CONLAN

(Phone / Fax) (949) 642 0245

(email, if possible) linda.conlan@amecfw.com

SITE LOCATION (include City / County / State) 3200 FRUITLAND AVENUE VERNON / LOS ANGELES / CALIFORNIA

RAILROAD MILEPOST AND SUBDIVISION _____
(or DOT Crossing Number on nearest railroad/street crossing)

LATITUDE AND LONGITUDE *(degrees/minutes/seconds)* _____

ADVISE THE NAME, ADDRESS, & CONTACT PERSON OF THE GOVERNMENTAL AGENCY REQUIRING THIS PROJECT:

NATHAN DADAP - U.S. EPA REGION 9 LAND DIVISION, RCRA BRANCH
75 HAWTHORNE STREET, SAN FRANCISCO, CA 94105
415-972-3654

Please describe your proposed project:

PROJECT LEVEL(S):

_____ PHASE I (Non-invasive & non-intrusive visual site inspection and records check only. No sampling will be involved.)

X PHASE II (Site investigation. You must advise specific testing to be performed from the list on the next page.)

_____ PHASE III (Site remediation.)

_____ OTHER (Please describe your project in detail only as it pertains to railroad property)

TERM: DATES

From: _____ To: _____ (Includes removal/lawful closure of facilities and/or monitoring wells)

TYPE OF ENVIRONMENTAL TESTING	NUMBER OF EACH
Subsurface Soil/Sediment Samples	28
Hand Held Auger Borings	12
Soil Gas Survey Points	
Boring Drilled w/Soil Samples	
Temporary Piezometer Wells	
Temporary Monitor Wells (must be flush-mounted)	
Permanent Monitoring Wells	
Recovery Wells & Associated above Ground Equipment	
Recovery Systems & Above Ground Equipment	

Other (Describe fully)_____

SPECIAL PROVISIONS:

_____CONFIDENTIALITY (Required for all cases involving sale of Railroad property & in many other cases.)

__X__RAILROAD FLAGMAN (Required in all Phase II/III cases & many other cases.)

_____MONITORING WELL (Required for all monitor wells & piezometers.)

_____FURNISH INFORMATION (Required in all cases.)

_____PROOF OF FINANCIAL CAPABILITY OR PERFORMANCE BOND (Required for all monitor wells, piezometers, & other facilities.)

CONTRACTOR INFORMATION:

*(Must be copied for **all contractors** that will work under this agreement)*

NAME OF CONTRACTOR INTERPHASE ENVIRONMENTAL, INC.

INCORPORATED IN WHAT STATE CALIFORNIA

FULL MAILING ADDRESS 6200 PEACHTREE
LOS ANGELES, CALIFORNIA 90040

NAME & TITLE OF CONTRACTOR CONTACT PERSON TES DE LEON

CONTRACTOR TELEPHONE NUMBER (323) 278-7700

CONTRACTOR FAX NUMBER (323) 278-7707

EMAIL ADDRESS office@interphase-inc.com

(✓) COMPLETE AND RETURN THIS APPLICATION FORM, with
(✓) A $555.00 CHECK *(Payable to Union Pacific Railroad Company)*, and
(✓) THE OTHER REQUESTED MATERIAL ON THE CHECKLIST
to the appropriate Environmental Access Manager.

NOTE: Other fees and charges may be applicable to your request. These charges cannot be determined until your Project is approved.

WORK PLAN
PROPOSED SOIL SAMPLES UPRR SEGMENT

Former Pechiney Cast Plate, Inc. Facility

3200 Fruitland Avenue

Vernon, California

Prepared for:

Pechiney Cast Plate, Inc.

Prepared by:

Amec Foster Wheeler Environment & Infrastructure, Inc.
121 Innovation Drive, Suite 200
Irvine, California 92617-3094
(949) 642-0245

December 15, 2015

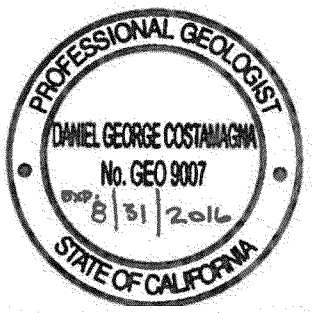
Project No. 0106270030

WORK PLAN
PROPOSED SOIL SAMPLES UPRR SEGMENT
Former Pechiney Cast Plate, Inc. Facility
3200 Fruitland Avenue
Vernon, California

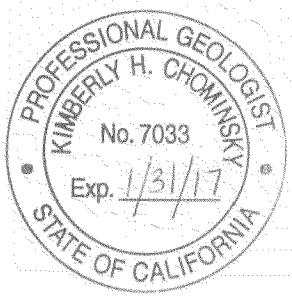
December 15, 2015
Project 0106270030

This work plan was prepared by the staff of Amec Foster Wheeler Environment & Infrastructure, Inc., under the supervision of the Engineer(s) and/or Geologist(s) whose seal(s) and signature(s) appear hereon.

The findings, recommendations, specifications, or professional opinions are presented within the limits described by the client, in accordance with generally accepted professional engineering and geologic practice. No warranty is expressed or implied.



Daniel G. Costamagna, PG No. 9007
Senior Geologist



Kimberly Holland-Chominsky, PG No. 7033
Senior Associate Geologist

WORK PLAN
PROPOSED SOIL SAMPLES UPRR SEGMENT
Former Pechiney Cast Plate, Inc. Facility
Vernon, California

1.0 INTRODUCTION AND AGENCY DIRECTIVE

Amec Foster Wheeler Environment & Infrastructure, Inc. (Amec Foster Wheeler) has prepared this work plan (WP) on behalf of Pechiney Cast Plate, Inc. (Pechiney), for the former Pechiney property located at 3200 Fruitland Avenue, in Vernon, California (the site; Figure 1) and at the direction of the United States Environmental Protection Agency (U.S. EPA) for additional characterization of polychlorinated biphenyls (PCBs) that may be encountered in soils.

The WP is intended to be a plan that describes the protocols for handling, managing and sampling soil. Depending on the analytical results obtained from the soil samples, additional samples may be collected.

Mr. Nathan Dadap of the U.S. EPA has directed Pechiney to conduct the PCB sampling activities. His contact information is as follows.

Nathan Dadap
U.S. EPA Region 9
Land Division, RCRA Branch
75 Hawthorne Street
San Francisco, CA 94105
415-972-3654

2.0 SCOPE OF WORK

This section provides procedures for soil sampling, equipment decontamination, managing and characterization of soil with residual chemicals of potential concern (COCs) remaining at concentrations below or above the site-specific remediation goals for the Pechiney site (Table 1).

2.1 SOIL CONTAINING PCBS AND OTHER COCS

PCBs were detected above the site-specific remediation goals at three locations (W-1, W-2, SWO-6-N and SWO-6-S) as shown on Figure 2. In addition, arsenic was detected above the site-specific remediation goal in two soil samples (W-24 and W-25). Soil samples will be collected at 1, 3, and 5 feet below native grade at the locations shown on Figure 2. Based on data already collected, U.S. EPA is requiring samples to be collected within 25 feet of the

active rail line shown on Figure 2. Locations where sampling occurs shall be documented and surveyed.

Soils generated during sampling shall be containerized in 55-gallon drums and relocated to the Pechiney site for waste characterization and disposal.

2.2 SOIL TESTING AND EQUIPMENT DECONTAMINATION

Soil sampling and analysis for PCBs and arsenic shall be conducted to assess the presence of these COCs at concentrations above the remediation goals (Table 1).

The number of, and the methods used to collect the soil samples and the analyses to be performed shall be selected in the field by the supervising Professional Geologist (PG) or Professional Engineer (PE). The analytical suite shall be selected based on field observations, and may include the following test methods:

- PCBs using EPA Method 8082 (using soxhlet extraction method 3540C);
- Arsenic using EPA Methods 6010B

Samples shall be collected in glass jars, which shall be sealed, uniquely labeled, and stored in an ice-chilled cooler. The samples shall be shipped to an analytical laboratory using chain of custody procedures.

Re-useable sampling equipment (hand augers, shovels, etc.) will be decontaminated using the following steps to reduce the potential for cross-contamination.

1. wash and scrub in non-phosphate detergent and potable water;
2. rinse in potable water; and
3. rinse in hexane and air dried

Investigation derived waste, including decontamination water, shall be managed and stored at the Pechiney site in accordance with regulatory requirements.

2.3 WASTE MANAGEMENT

The soil shall be profiled for disposal. Waste profiling shall consist of collecting soil samples (from hand auger) for laboratory analyses. Sampling shall be conducted in conformance with the procedures stipulated by the supervising PG or PE. Soil samples shall be analyzed for COCs specified above.

Other analyses may be required contingent on waste profiling requirements, receiving facility requirements, or other regulatory directives.

3.0 HEALTH & SAFETY AND INSURANCE REQUIREMENTS

Project personnel shall comply with all applicable federal, state, and local regulations, as well as Occupational Safety and Health Administration (OSHA) regulations specified in 29 Code of Federal Regulations 1910.120 and Code of California Regulations Title 8, Section 5192. A site-specific health and safety plan shall be prepared prior to the start of sampling.

Railroad protective liability insurance will be obtained prior to the start of work. All required insurance certificates will be included with the executed agreement for access.

4.0 REFERENCE

AMEC, 2012, Feasibility Study, Former Pechiney Cast Plate, Inc., Facility, Vernon, California, May 7.

TABLE

TABLE 1

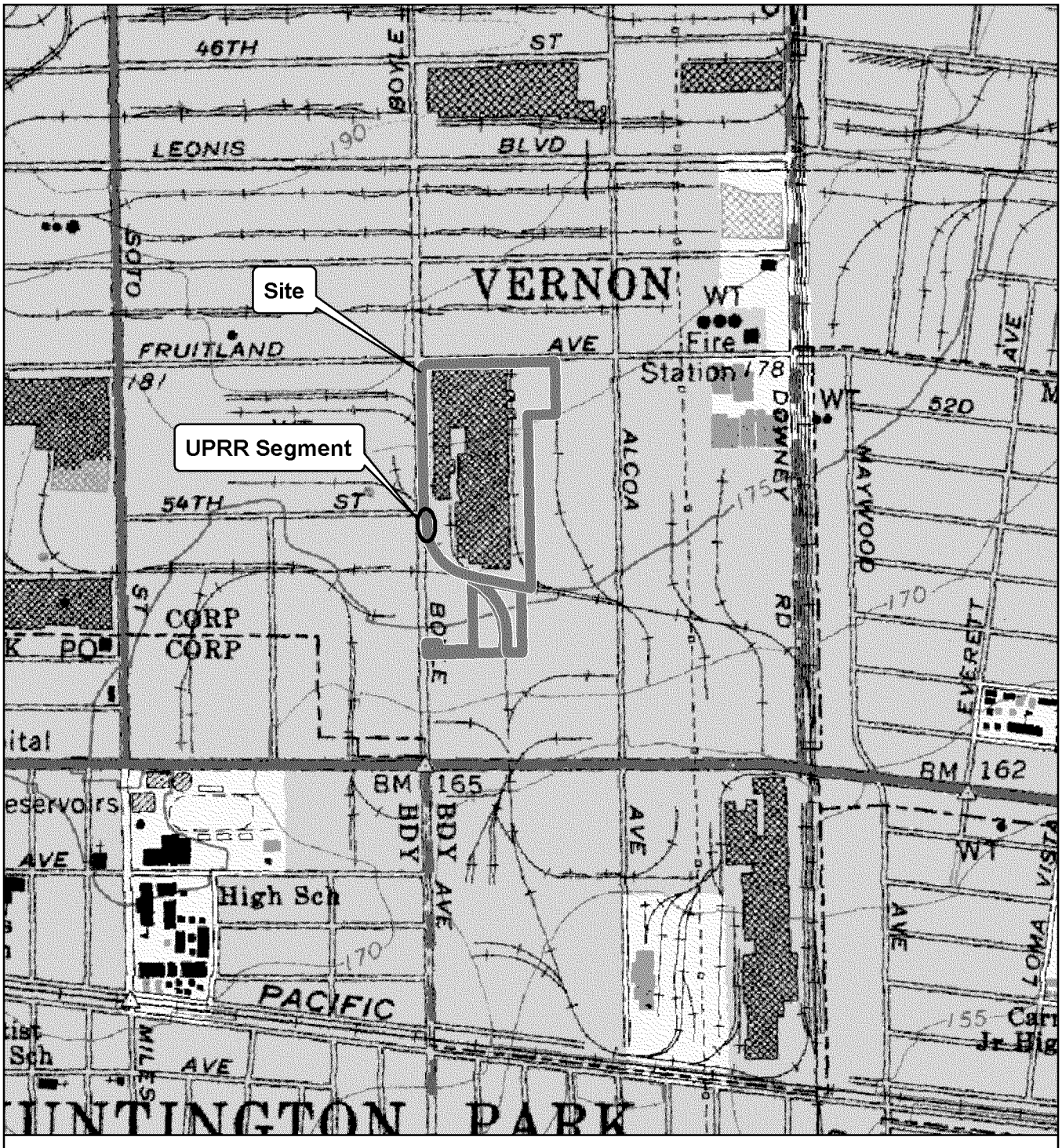
SITE-SPECIFIC REMEDIATION GOALS
PCBs AND ARSENIC IN SOIL
Pechiney Cast Plate, Inc. Facility - UPRR Segmest
3200 Fruitland Avenue
Vernon, California

Compound	Remediation Goal (mg/kg)	Explanation
PCBs in Soil		
Aroclor-1254	2.0	Noncarcinogenic RBSL[1] for construction workers. Also protective of commercial/industrial worker exposure.
Total Aroclors *For soil that may be left exposed at the surface (0 to 5 feet bgs)*	3.5	Based on the regression analysis for dioxin-like PCB congeners versus total Aroclors in combined soil and concrete presented in Appendix E of the FS (AMEC, 2012a), the total Aroclor concentration that would result in a maximum dioxin TEQ concentration of 81 pg/g.[2] Protective of cumulative commercial/industrial worker exposure, and cumulative construction worker exposure, to PCBs.
Total Aroclors *For subsurface soil (5 to 15 feet bgs) that only construction workers may come into contact with during excavation, grading, etc. (and that would remain at 5 to 15 feet bgs)*	23	Based on the regression analysis for dioxin-like PCB congeners versus total Aroclors in combined soil and concrete presented in Appendix E of the FS (AMEC, 2012), the total Aroclor concentration that would result in a maximum dioxin TEQ concentration of 530 pg/g.[3] Protective of cumulative construction worker exposure to PCBs.
Arsenic in Soil		
Arsenic	10	Site-Specific Background Concentration in Soil, established as described in Appendix B of the FS (AMEC, 2012).

Notes
1. Developed based on the methodology described in Appendix C of the FS (AMEC, 2012a), RBSLs were used to conduct the screening-level human health risk assessment for the Site.
2. Based on the carcinogenic RBSL for dioxin-like PCB congeners for outdoor commercial/industrial workers (8.1 pg/g TEQ), adjusted to a target cancer risk of 10-5.
3. Based on the carcinogenic RBSL for dioxin-like PCB congeners for construction workers (53 pg/g TEQ), adjusted to a target cancer risk of 10-5.

Abbreviations
bgs = below ground surface
FS = Feasibility Study
mg/kg = milligrams per kilogram
PCBs = polychlorinated biphenyls
pg/g = picograms/gram
RBSL = risk-based screening level
TEQ = toxic equivalent

FIGURES



Basemap modified from U.S.G.S. 7.5 minute quadrangle map
South Gate 1964, California. Photo-revised 1981.

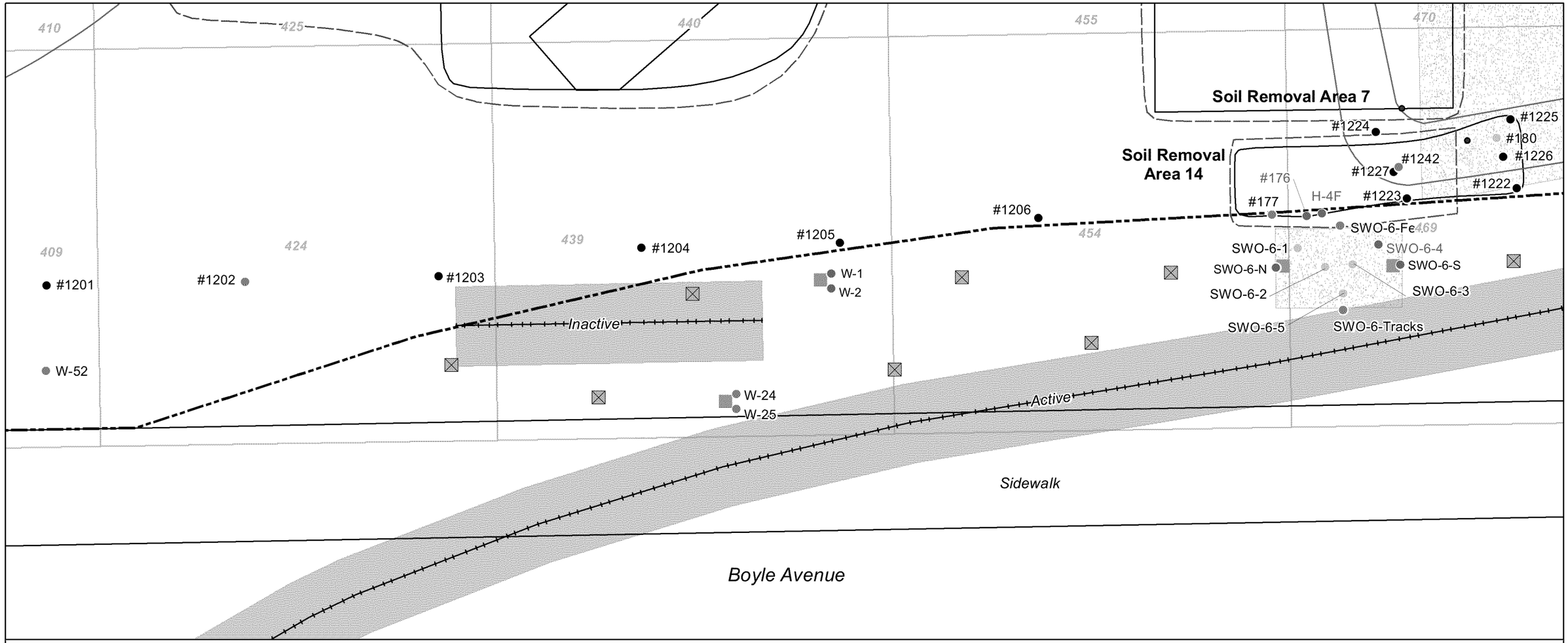
N

0 500 1,000

Approximate Scale in Feet

SITE LOCATION MAP Former Pechiney Cast Plate, Inc. Facility 3200 Fruitland Avenue Vernon, California		amec foster wheeler
Date: 12/14/2015	Project No.: 10627.003	Figure 1
Submitted By: lc	Drawn By: pah	

File path: Y:\10627.003.0\esri\Proposed UPRR Soil Sample_tb_site_location map.mxd



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Explanation

- Proposed soil sample at 1, 3, and 5 feet
- Proposed soil sample at 5 feet
- PCBs in soil above site-specific remediation goal of 3.5 mg/kg
- PCBs in soil below the site-specific remediation goal of 3.5 milligrams per kilogram (mg/kg)
- PCBs in soil below site-specific remediation goal of 3.5 mg/kg or not detected, but excavated due to structure removal or other soil removals
- Polychlorinated Biphenyls (PCBs) in soil reported as not detected
- Excavated soil sample
- Railroad tracks (at grade)
- Site boundary
- Soil removal area
- Rail bed
- Previous excavation area (all previous limits of excavation are approximate)
- Sample index grid and reference number

Note:

Proposed sample locations are approximate and will be adjusted in the field to avoid existing rail ballast and rail ties.

0 5 10
Approximate Scale in Feet

N

Basemap modified from surveys conducted May 31, 2006 and June 6, 2006 by CalVada Surveyors; and surveys conducted October 12, 2011 and September 10, 2013 by Dulin & Boynton.

PROPOSED SOIL SAMPLES
UPRR SEGMENT
Former Pechiney Cast Plate, Inc. Facility
3200 Fruitland Avenue
Vernon, California

amec foster wheeler

Date: 12/15/2015	Project No.: 10627.003	Figure 2
Submitted By: lc	Drawn By: pah	